

September 9, 2021

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

RE: Commonwealth of Puerto Rico, Case No. 17 BK 3283-LTS and
Prime Clerk Case no.17-03283

Respectable Judge:

I am filing a response to the Opposing Omnibus Objections of my mother and father, to explain the objections to my claim.

My name is Myriam Gandia; I live in the State of Florida. I am the daughter of Genara Cruz Del Moral and Fernando Figueroa Martinez.

I want to respond to the rejection disallow of Omnibus Objections, Commonwealth of Puerto Rico, and Title III.

1. **Genara Cruz Del Moral–Claim no. 179447, ss no. 0240**, born 1931 in Yabucoa, Puerto Rico, deceased on 25 July 2002, in Yabucoa. Worked as a Food Service Worker in the Yabucoa Public Schools for many years until retired.
 - a. The Opposing the Omnibus Objection was because, the Proof of claim not timely filed.
 - b. I am opposing to the decision for the reason of filing after deadline set by the Bar date order because, the information received to apply for this claim was in July 2021 and it was sent to the Puerto Rico address. When I went to Puerto Rico this past July, the letter was given to me. When I returned home immediately I submitted the claim online by July 14, 2021.
2. **Fernando Figueroa Martinez–Claim no. 173753, ss no. 0133**, born 1922, in Yabucoa, Puerto Rico, deceased on 18 March 2015, in Brooklyn, New York. Worked in the Yabucoa Central Roig Sugar Corporation until retired.
 - a. The Opposing the Omnibus Objection was because, Proof of claim and supporting documentation and that Central Roig were not part of the Title III proceedings.
 - b. I am opposing to the decision for the reason, when I received the information back in April 2020, I submitted this claim online through Prime Clerk for the Commonwealth of Puerto Rico Bankruptcy, and under the retirement system, Class Action Law Suit with Promesa Title III. This claim were for wages owed to the debtor, retired employees of the different companies in Puerto Rico, which include Central Roig Sugar Corporation, were the wages were reduced at the time my father worked at the company Central Roig. In that company there were no paper work for retirement filed.

I am asking the Court to please review these cases in consideration of my parents that had worked so hard in Puerto Rico and You the Court can make a sincere determination in favor and behave of my parents. Thank you.

Sincerely;



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PS: Five attachments